

EXHIBIT A

FILED: QUEENS COUNTY
NYSCEF DOC. NO. 1

ERK 11/25/2020 01:01 PM

INDEX NO. 722803/2020

RECEIVED NYSCEF: 11/25/2020

SUPREME COURT OF THE STATE OF NEW YORK
COUNTY OF QUEENS

Index No.:
Date Purchased:
SUMMONS

DONOVAN THOMPSON,
Plaintiff,

Plaintiff designates Queens
County as the place of trial.

-against-

RYDER TRUCK RENTAL INC., and
KUWAN LARUE WRIGHT,
Defendants,

The basis of venue is:
Plaintiff's residence

Plaintiff resides at:
1040 Neilson Street, Apt 5L
Far Rockaway, NY 1169

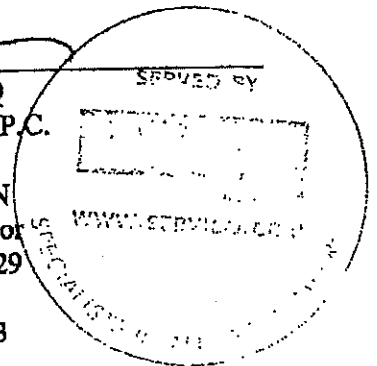
County of Queens.

TO THE ABOVE NAMED DEFENDANTS:

YOU ARE HEREBY SUMMONED to answer the complaint in this action, and to serve a copy of your answer, or, if the complaint is not served with this summons, to serve a notice of appearance on the Plaintiff's attorney(s) within twenty days after the service of this summons, exclusive of the day of service, where service is made by delivery upon you personally within the state, or, within 30 days after completion of service where service is made in any other manner. In case of your failure to appear or answer, judgment will be taken against you by default for the relief demanded in the complaint.

Dated: Brooklyn, New York
November 19, 2020

AKIVA OFSHEIN, ESQ
OFSHEIN LAW FIRM, P.C.
Attorneys for Plaintiff
DONOVAN THOMPSON
15 Bay 29th Street, 2nd Floor
Brooklyn, New York 11229
(718) 455-5252
Our File No. 19MVX5693



State of New York - Department of State
Division of Corporations

Party Served:
RYDER TRUCK RENTAL, INC.

Plaintiff/Petitioner:
THOMPSON, DONOVAN

C/O CORPORATE CREATIONS NETWORK INC.
600 MAMARONECK AVENUE
SUITE 400
HARRISON, NY 10528

Dear Sir/Madam:
Enclosed herewith is a legal document which was served upon the Secretary of State on 12/14/2020 pursuant to SECTION 306 OF THE BUSINESS CORPORATION LAW.
This copy is being transmitted pursuant to such statute to the address provided for such purpose.

Very truly yours,
Division of Corporations

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NYSCEF DOC. NO. 1

INDEX NO. 722803/2020

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TO DEFENDANTS:

RYDER TRUCK RENTAL INC.
11690 NW 105th STREET
MIAMI, FL 33178

KUWAN LARUE WRIGHT
53 LINNMOORE STREET
HARTFORD, CT 06114

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SUPREME COURT OF THE STATE OF NEW YORK
COUNTY OF QUEENS

Index No.:

Date Purchased:

DONOVAN THOMPSON,

Plaintiff,

VERIFIED COMPLAINT

-against-

RYDER TRUCK RENTAL INC., and
KUWAN LARUE WRIGHT,

Defendants,

Plaintiff, DONOVAN THOMPSON, by his attorneys, OFSHTEIN LAW FIRM, P.C.,
complaining of the Defendants, RYDER TRUCK RENTAL INC., and KUWAN LARUE
WRIGHT, respectfully alleges, upon information and belief:

1. At all times herein mentioned, Plaintiff, DONOVAN THOMPSON, was and still is a resident of the County of Queens, City and State of New York.
2. At all times herein mentioned, Defendant, KUWAN LARUE WRIGHT, was and still is a resident of the County of Hartford, City and State of Connecticut.
3. At all times herein mentioned, Defendant, RYDER TRUCK RENTAL INC., was and still is a domestic corporation duly organized and existing under and by virtue of the laws of the State of Florida, with a principal office in Miami-Dade County.
4. At all times herein mentioned, Defendant, RYDER TRUCK RENTAL INC., was and still is a professional corporation duly organized and existing under and by virtue of the laws of the State of Florida, with a principal office in Miami-Dade County.

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NYSCEF DOC. NO. 1

INDEX NO. 722803/2020

RECEIVED NYSCEF: 11/25/2020

5. At all times herein mentioned, Defendant, **RYDER TRUCK RENTAL INC.**, was and still is a duly authorized foreign corporation doing business in the State of Florida, with a principal office in Miami-Dade County.

6. At all times herein mentioned, Defendant, **RYDER TRUCK RENTAL INC.**, was and still is a duly authorized foreign corporation transacting business in the State of Florida.

7. At all times herein mentioned, Defendant, **RYDER TRUCK RENTAL INC.**, does and/or solicits business within the State of Florida.

8. At all times herein mentioned, Defendant, **RYDER TRUCK RENTAL INC.**, derives substantial revenue from goods used or consumed or services rendered in the State of Florida.

9. At all times herein mentioned, Defendant, **RYDER TRUCK RENTAL INC.**, expected or reasonably should have expected its acts and business activities to have consequences within the State of Florida.

10. At all times herein mentioned, Defendant, **RYDER TRUCK RENTAL INC.**, derives substantial revenues from interstate or international commerce.

11. At all times herein mentioned, Defendant, **RYDER TRUCK RENTAL INC.**, was and still is a domestic limited liability company duly organized and existing under and by virtue of the laws of the State of Florida, with a principal office in Miami-Dade County.

12. At all times herein mentioned, Defendant, **RYDER TRUCK RENTAL INC.**, was and still is a duly authorized foreign limited liability company duly organized and existing under and by virtue of the laws of the State of Florida, with a principal office in Miami-Dade County.

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NYSCEF DOC. NO. 1

INDEX NO. 722803/2020

RECEIVED NYSCEF: 11/25/2020

13. At all times herein mentioned, Defendant, **RYDER TRUCK RENTAL INC.**, was and still is a duly organized general partnership existing and doing business under and by virtue of the laws of the State of Florida.

14. At all times herein mentioned, Defendant, **RYDER TRUCK RENTAL INC.**, was and still is a duly organized limited partnership existing and doing business under and by virtue of the laws of the State of Florida.

15. At all times herein mentioned, Defendant, **RYDER TRUCK RENTAL INC.**, was and still a duly organized proprietorship existing and doing business under the laws of the State of Florida.

16. That on September 26, 2020, Defendant, **RYDER TRUCK RENTAL INC.**, was the registered owner of a 2019 Freightler, commercial truck bearing State of Connecticut registration number 63826A.

17. That on September 26, 2020, Defendant, **RYDER TRUCK RENTAL INC.**, was the lessor of a 2019 Freightler, commercial truck bearing State of Connecticut registration number 63826A.

18. That on September 26, 2020, Defendant, **RYDER TRUCK RENTAL INC.**, was the lessee of a 2019 Freightler, commercial truck bearing State of Connecticut registration number 63826A.

19. That on September 26, 2020, Defendant, **KUWAN LARUE WRIGHT**, was the operator of a 2019 Freightler, commercial truck bearing State of Connecticut registration number 63826A.

20. That on September 26, 2020, Defendant, **KUWAN LARUE WRIGHT**, was

FILED: QUEENS COUNTY CLERK 11/25/2020 01:01 PM

INDEX NO. 722803/2020

NYSCEF DOC. NO. 1

RECEIVED NYSCEF: 11/25/2020

controlling the 2019 Freightler, commercial truck bearing State of Connecticut registration number 63826A.

21. That on September 26, 2020, Defendant, **KUWAN LARUE WRIGHT**, was controlling the 2019 Freightler, commercial truck bearing State of Connecticut registration number 63826A, with the knowledge of defendant owner.

22. That on September 26, 2020, Defendant, **KUWAN LARUE WRIGHT**, was controlling the 2019 Freightler, commercial truck bearing State of Connecticut registration number 63826A, with the permission of defendant owner.

23. That on September 26, 2020, Defendant, **KUWAN LARUE WRIGHT**, was controlling the 2019 Freightler, commercial truck bearing State of Connecticut registration number 63826A, with the express consent of defendant owner.

24. That on September 26, 2020, Defendant, **KUWAN LARUE WRIGHT**, was controlling the 2019 Freightler, commercial truck bearing State of Connecticut registration number 63826A, with the implied consent of defendant owner.

25. That on September 26, 2020, Defendant, **KUWAN LARUE WRIGHT**, was operating and controlling the 2019 Freightler, commercial truck bearing State of Connecticut registration number 63826A, on Francis Lewis Boulevard at its intersection of Sunrise Highway, Queens County, New York.

26. That on September 26, 2020, Defendant, **KUWAN LARUE WRIGHT**, was operating and controlling the 2019 Freightler, commercial truck bearing State of Connecticut registration number 63826A, within the scope of his employment.

27. At the aforesaid date and place, Plaintiff, **DONOVAN THOMPSON**, was lawful

FILED: QUEENS COUNTY CLERK 11/25/2020 01:01 PM

INDEX NO. 722803/2020

NYSCEF DOC. NO. 1

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passenger in a 2000 Volkswagen, motor vehicle bearing State of New York registration number JLU8387, when defendants' motor vehicle forcibly, without warning, struck the vehicle of the plaintiff.

28. That as a result of the aforesaid contact, Plaintiff, **DONOVAN THOMPSON**, was injured.

29. That the aforesaid occurrence was caused wholly and solely by reason of the negligence of the Defendants without any fault or negligence on the part of the Plaintiff contributing thereto.

30. That Defendants were negligent, careless and reckless in the ownership, operation, management, maintenance, supervision, use and control of the aforesaid vehicle and the Defendants was otherwise negligent, careless and reckless under the circumstances then and there prevailing.

31. That by reason of the foregoing, Plaintiff, **DONOVAN THOMPSON**, sustained severe and permanent personal injuries and was otherwise damaged.

32. That Plaintiff, **DONOVAN THOMPSON**, sustained serious injuries as defined by §5102(d) of the Insurance Law of the State of New York.

33. That Plaintiff, **DONOVAN THOMPSON**, sustained serious injuries and economic loss greater than basic economic loss as defined by §5104 of the Insurance Law of the State of New York.

34. That Plaintiff, **DONOVAN THOMPSON**, is not seeking to recover any damages for which Plaintiff has been reimbursed by no-fault insurance and/or for which no-fault insurance is obligated to reimburse Plaintiff. Plaintiff is seeking to recover only those damages not recoverable through no-fault insurance under the facts and circumstances in this action.

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INDEX NO. 722803/2020

NYSCEF DOC. NO. 1


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35. That this action falls within one or more of the exceptions set forth in CPLR §1602.

36. That by reason of the foregoing, Plaintiff, **DONOVAN THOMPSON**, has been damaged in a sum which exceeds the jurisdictional limits of all lower courts which would otherwise have jurisdiction.

WHEREFORE, Plaintiff, **DONOVAN THOMPSON**, demands judgment against the Defendants, **RYDER TRUCK RENTAL INC.**, and **KUWAN LARUE WRIGHT**, in a sum exceeding the jurisdictional limits of all lower courts which would otherwise have jurisdiction, together with the costs and disbursements of this action.

Dated: Brooklyn, New York
November 19, 2020


AKIVA OFSHTEIN, ESQ
OSHShteIN LAW FIRM, P.C.
Attorneys for Plaintiff
DONOVAN THOMPSON
15 Bay 29th Street, 2nd Floor
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INDEX NO. 722803/2020

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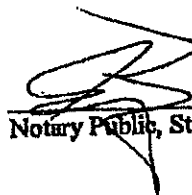
VERIFICATION

STATE OF NEW YORK)ss:
COUNTY OF KINGS)

Donovan Thompson being duly sworn, deposes and says that
deponent is the claimant in the within action; that deponent has read the foregoing
VERIFIED SUMMONS AND COMPLAINT, and knows the contents thereof; that the
same is true to deponent's own knowledge, except as to matters therein stated to be
alleged upon information and belief, and that as to those matters, deponent believes it to
be true.



Sworn to before me this 25 day,
of November, 2020.


Notary Public, State of New York

Eugene Kazakovich
Commission Expires 12/31/2021
City of New York
Cert. Filed 11/25/2020
Commission No. 11111111111111111111